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AUGUST 15, 2024

VIA ECF

The Honorable Pamela K. Chen
United States District Court for the Eastern District of New York
225 Cadman Plaza East, Room N631
Brooklyn New York 11201

Re: **Michael Grecco Productions, Inc. v. Alamy Inc. and Alamy Ltd.**
No. 1:18-cv-3260-PKC-JAM

Dear Judge Chen:

On behalf of Plaintiff Michael Grecco Productions, Inc. (“MGPI”), I write in response to Your Honor’s July 10, 2024 Order, which directed the parties to advise the Court by August 15, 2024, regarding any potential impact of the later-filed, related case *Michael Grecco Productions, Inc. v. Alamy Inc. et al*, 23-CV-8321 (PKC) (JAM) (“MGPI 2”) on the pending motion for summary judgment in the current case once all defendants are served and discovery begins in the MGPI 2 case.

There has been no change at this time in Plaintiff’s position concerning the issues with determining whether all alleged “contributors” to whom the Alamy defendants attribute responsibility for the versions of the Copyrighted Works underlying MGPI’s claims in the MGPI 2 case are actual entities and all the connections, if any, between the “contributors” identified in the MGPI 2 case and this case. Plaintiff has not yet served the discovery requests necessary to investigate those questions further. Currently, lead counsel for MGPI has been out of the office and unavailable due to an urgent family health issue. Lead counsel currently anticipates returning to the office next week and will act promptly at that point to serve the necessary discovery and work with counsel for the defendants to schedule the necessary depositions of the witnesses with knowledge.

Respectfully submitted,

/s/Stephanie Lamerce

Stephanie Lamerce

The Honorable Pamela K. Chen
August 15, 2024
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cc: All Counsel of Record (*via ECF*)